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6 *Attorneys for Defendant*  
7 *China XD Plastics Company Limited*

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 JAGDISH KOTHARI,

CASE NO.: 2:20-CV-01330-APG-BNW

11 Plaintiff,

12 v.

13 CHINA XD PLASTICS COMPANY  
14 LIMITED, JIE HAN, TAYLOR ZHANG,  
15 LINYUAN ZHAI, HUIYI CHEN, and  
16 GUANBAO HUANG,

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO RESPOND TO  
COMPLAINT  
[SECOND REQUEST]**

Defendants.

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18 Defendant China XD Plastics Company Limited (“China XD”), by and through their  
19 attorneys, E. Leif Reid and Darren J. Lemieux of Lewis Roca Rothgerber Christie LLP, and  
20 Plaintiff Jagdish Kothari (“Plaintiff”), through his attorneys, John P. Aldrich of Aldrich Law Firm,  
21 Ltd. and Donald J. Enright of Levi & Korsinsky LLP, hereby stipulate and agree to the following:

22 1. On July 17, 2020, Plaintiff filed their Complaint against, amongst other defendants,  
23 China XD. [ECF No. 1]. On or about July 21, 2020, Plaintiff served the Summons and Complaint  
24 on China XD.

25 2. On September 17, 2020, Plaintiff and China XD filed a stipulation in which China  
26 XD would have up to and including Monday, November 2, 2020, to respond to Plaintiff’s

1 Complaint. [ECF No. 11]. This was the parties' first request to extend the deadline for China XD  
2 to respond to Plaintiff's Complaint.

3       3. On September 22, 2020, this Court granted in part and denied in part the parties'  
4 stipulation, granting China XD an extension to October 13, 2020, to respond to Plaintiff's  
5 Complaint. [ECF No. 14]. In doing so, this Court indicated it would consider another stipulation  
6 extending the October 13, 2020, deadline, provided the parties provide a more detailed explanation  
7 for why the extension is sought.

8       4. The parties are currently engaged in discussions which, if successful, will result in  
9 a mootness dismissal of this case. Accordingly, the parties respectfully request this Court grant the  
10 additional extension of time for China XD to respond to Plaintiff's Complaint until November 2,  
11 2020, so that the parties can attempt to fully resolve this matter. This is the parties' second request  
12 for an extension of time.

13       5. The parties further stipulate that, in the event the parties are unable to resolve this  
14 matter and China XD files anything other than an Answer to the Complaint on November 2, 2020,  
15 Plaintiff shall have up to and including December 2, 2020, to file an Opposition brief.

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**Lewis Roca**  
ROTHGERBER CHRISTIE

1           6.     These extensions are requested in good faith and not any dilatory purpose.

2     DATED this 7th day of October, 2020.

3     ALDRICH LAW FIRM, LTD.

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5     /s/ John P. Aldrich

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9     LEVI & KORSINSKY LLP

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13     *Attorneys for Plaintiff*

14     Jagdish Kothari

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**Lewis Roca**  
ROTHGERBER CHRISTIE

**IT IS SO ORDERED**

**DATED:** 3:56 pm, October 09, 2020



**BRENDA WEKSLER**  
**UNITED STATES MAGISTRATE JUDGE**